## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

## Alexandria Division

| UNITED STATES OF AMERICA | ) |                           |
|--------------------------|---|---------------------------|
|                          | ) | Case No. 1:20-CR-143      |
| v.                       | ) |                           |
|                          | ) | Honorable T.S. Ellis, III |
| ZACKARY ELLIS SANDERS,   | ) |                           |
|                          | ) | Trial: February 9, 2021   |
| Defendant.               | ) |                           |
|                          | ) |                           |

## **GOVERNMENT'S EXHIBIT LIST**

| EXHIBIT NO. | <u>DESCRIPTION</u>                                  | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 1-1         | Audio recording, interview of the defendant - Bulk  |                |                 |
| 1-1A        | Clip 1, audio recording, interview of the defendant |                |                 |
| 1-1B        | Clip 2, audio recording, interview of the defendant |                |                 |
| 1-1C        | Clip 3, audio recording, interview of the defendant |                |                 |
| 1-1D        | Clip 4, audio recording, interview of the defendant |                |                 |

| EXHIBIT NO. | <u>DESCRIPTION</u>                            | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 2-1         | Search Warrant Photo: the defendant's bedroom |                |                 |
| 2-2         | Search Warrant Photo: the defendant's bedroom |                |                 |

| 2-3  | Search Warrant Photo: the defendant's bedroom   |  |
|------|---|--|
| 2-4  | Search Warrant Photo: the defendant's bedroom   |  |
| 2-5  | Search Warrant Photo: the defendant's desk  |  |
| 2-6  | Search Warrant Photo: Apple iPad (1B22)   |  |
| 2-7  | Search Warrant Photo: Apple iPad (1B19) and HP Elite Book 755 laptop (1B2) under mattress |  |
| 2-8  | Search Warrant Photo: the defendant's bedside table                                       |  |
| 2-9  | Search Warrant Photo : Sandisk<br>Cruzer Edge thumb drive (1B1)                           |  |
| 2-10 | Search Warrant Photo: Lexar thumb drive (1B3)   |  |
| 2-11 | Search Warrant Photo: HP laptop (1B5) in closet   |  |

| EXHIBIT NO. | <u>DESCRIPTION</u>                     | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|--|----------------|-----------------|
| 3-1         | Birth Certificate of MINOR VICTIM 1    |                |                 |
| 3-2         | Birth Certificate of MINOR VICTIM 3    |                |                 |
| 3-3         | Birth Certificate of MINOR<br>VICTIM 4 |                |                 |
| 3-4         | Birth Certificate of MINOR<br>VICTIM 5 |                |                 |

| EXHIBIT NO. | <u>DESCRIPTION</u>  | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 4-1         | Apple iPad (S/N:<br>DMPBGGCPHDDV) (1B19) –<br>Bulk                  |                |                 |
| 4-2         | Chain of Custody Form   |                |                 |
| 4-3         | Full file system extraction of Apple iPad (1B19) - Bulk             |                |                 |
| 4-4         | Apple iPhone (S/N:<br>C39VJ0XDJCL6) (1B27) – Bulk                   |                |                 |
| 4-5         | Chain of Custody form   |                |                 |
| 4-6         | Full file system extraction of Apple iPhone (1B27) – Bulk           |                |                 |
| 4-7         | 902(14) certification for Apple iPad (1B19) and Apple iPhone (1B27) |                |                 |

| EXHIBIT NO. | <u>DESCRIPTION</u>                                      | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 5-1         | Apple iPad (S/N:<br>DMPHM3K7DVGF) (1B22) –<br>Bulk      |                |                 |
| 5-2         | Chain of Custody form                                   |                |                 |
| 5-3         | Full file system extraction of Apple iPad (1B22) - Bulk |                |                 |
| 5-4         | 902(14) certification for Apple iPad (1B22)             |                |                 |

| EXHIBIT NO. | <u>DESCRIPTION</u>                                     | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|--|----------------|-----------------|
| 6-1         | iMessage chat between the defendant and MINOR VICTIM 5 |                |                 |

|      | from Apple iPhone (1B27) ( <b>Obscene</b> )  |  |
|------|--|--|
| 6-1A | Excerpt of iMessage chat between the defendant and MINOR VICTIM 5                                      |  |
| 6-1B | Excerpt of iMessage chat between the defendant and MINOR VICTIM 5                                      |  |
| 6-1C | IMG_8872.jpeg  |  |
| 6-1D | Excerpt of iMessage chat between the defendant and MINOR VICTIM 5 (Obscene)                            |  |
| 6-1E | 528515934475083B650-4D97-<br>4C3D-92A9-<br>D9770E9DD635.MOV.mov<br>( <b>Obscene</b> )                  |  |
| 6-1F | Storyboard of<br>528515934475083B650-4D97-<br>4C3D-92A9-<br>D9770E9DD635.MOV.mov<br>( <b>Obscene</b> ) |  |
| 6-1G | Screenshot of<br>528515934475083B650-4D97-<br>4C3D-92A9-<br>D9770E9DD635.MOV.mov<br>( <b>Obscene</b> ) |  |
| 6-2  | Images and metadata from Apple iPhone (S/N: C39VJ0XDJCL6) (1B27)                                       |  |
| 6-3  | iMessage chat between the<br>defendant and MINOR VICTIM 3<br>from Apple iPhone (1B27)<br>(Obscene)     |  |
| 6-3A | Excerpt of iMessage chat between the defendant and MINOR VICTIM 3 (Obscene)                            |  |

|      | 1                                       |  |
|------|---|--|
| 6-3B | 52744582335 CB13D965-986D-              |  |
| 0-3D | 40A1-904D-28CB090A7B09.JPG              |  |
|      | 10111 70 12 2002070117207.01 0          |  |
| 6-3C | 527455337526385C049-5B1D-               |  |
|      | 49D3-905D-099A4F1C066D.JPG              |  |
|      | (Obscene)                               |  |
| ( 2D | 507.45.6507.60 PAGE 1011 41.01          |  |
| 6-3D | 52745652768B36E1911-41C1-<br>45E6-9ACE- |  |
|      | C322142BD83B.MOV ( <b>Obscene</b> )     |  |
|      | C322142DD03D.WO V (Obsecute)            |  |
| 6-3E | Storyboard of                           |  |
|      | 52745652768B36E1911-41C1-               |  |
|      | 45E6-9ACE-                              |  |
|      | C322142BD83B.MOV ( <b>Obscene</b> )     |  |
| 6-3F | 527479400165D3B67CA-148A-               |  |
| 0.51 | 4A62-9056-                              |  |
|      | EDE761A93D6B.MOV (Obscene)              |  |
|      |   |  |
| 6-3G | Storyboard of                           |  |
|      | 527479400165D3B67CA-148A-<br>4A62-9056- |  |
|      | EDE761A93D6B.MOV ( <b>Obscene</b> )     |  |
|      | LBE/01193B0B.MOV (Observe)              |  |
| 6-3H | Excerpt of iMessage chat between        |  |
|      | the defendant and MINOR                 |  |
|      | VICTIM 3                                |  |
| 6-3I | 54026732320 AF64280C-0AC4-              |  |
| 0-31 | 4295-8B28-94EED87B6B17.JPG              |  |
|      | +2/3 0B20 /+LLB0/B0B1/.31 G             |  |
| 6-3J | 54033199242C0AB5CB3-C1E7-               |  |
|      | 4748-A403-6B3FDB902C00.JPG              |  |
|      |   |  |
| 6-3K | Excerpt of iMessage chat between        |  |
|      | the defendant and MINOR                 |  |
|      | VICTIM 3                                |  |
| 6-3L | Excerpt of iMessage chat between        |  |
|      | the defendant and MINOR                 |  |
|      | VICTIM 3                                |  |
|      |   |  |

| 6-4  | Image and metadata from Apple iPhone (S/N: C39VJ0XDJCL6) (1B27)                                     |  |
|------|---|--|
| 6-5  | Telegram chat between the defendant and MINOR VICTIM 1 from Apple iPhone ( <b>Obscene</b> )         |  |
| 6-5A | Excerpt of Telegram chat between the defendant and MINOR VICTIM 1                                   |  |
| 6-5B | Excerpt of Telegram chat between the defendant and MINOR VICTIM 1 (Obscene)                         |  |
| 6-5C | IMG_9514.MOV (Obscene)  |  |
| 6-5D | Storyboard of IMG_9514.MOV (Obscene)  |  |
| 6-6  | Image and metadata from Apple iPhone (S/N: C39VJ0XDJCL6) (1B27)                                     |  |
| 6-7  | Telegram chat between the defendant and MINOR VICTIM 6 from Apple iPhone (1B27) (Obscene)           |  |
| 6-7A | Excerpt of Telegram chat between<br>the defendant and MINOR<br>VICTIM 6 from Apple iPhone<br>(1B27) |  |
| 6-7B | Excerpt of Telegram chat between<br>the defendant and MINOR<br>VICTIM 6 from Apple iPhone<br>(1B27) |  |
| 6-7C | Excerpt of Telegram chat between the defendant and MINOR VICTIM 6                                   |  |
| 6-7D | telegram-cloud-photo-size-1-<br>4974457012746299609-m.jpg   |  |

| 6-7E | Excerpt of Telegram chat between<br>the defendant and MINOR<br>VICTIM 6 from Apple iPhone<br>(1B27) ( <b>Obscene</b> ) |  |
|------|--|--|
| 6-7F | IMG_7104.mov (Obscene)   |  |
| 6-7G | Storyboard of IMG_7104.mov (Obscene)   |  |
| 6-7H | IMG_9316.mov (Obscene)   |  |
| 6-7I | Storyboard of IMG_9316.mov (Obscene)   |  |
| 6-8  | Image and metadata from Apple iPhone (1B27)  |  |
| 6-9  | Image and metadata from Apple iPhone (1B27)  |  |
| 6-10 | Image and metadata from Apple iPhone (1B27)  |  |

| EXHIBIT NO. | DESCRIPTION   | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 7-1         | Kik chat between the defendant and MINOR VICTIM 4 from Apple iPad (1B22) ( <b>Obscene</b> ) |                |                 |
| 7-1A        | 55630bdd-9ec8-4701-81cd-<br>5ba2f448b741.jpg  |                |                 |
| 7-1B        | f6261d32-41cb-43ff-9eda-<br>545348a3399a.jpg ( <b>Obscene</b> )                             |                |                 |
| 7-1C        | bc0e8cf8-0f0c-4e9f-bd54-<br>8af38e84e323.mp4 ( <b>Obscene</b> )                             |                |                 |
| 7-1D        | Storyboard of bc0e8cf8-0f0c-4e9f-bd54-8af38e84e323.mp4 ( <b>Obscene</b> )                   |                |                 |

| EXHIBIT NO. | <u>DESCRIPTION</u>  | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 8-1         | Kik chat between the defendant and MINOR VICTIM 2 from Apple iPad (1B19) ( <b>Obscene</b> ) |                |                 |
| 8-1A        | 6036a16b-dda8-4497-ae22-<br>e3e95a32cb7a.mp4 ( <b>Obscene</b> )                             |                |                 |
| 8-1B        | Storyboard of 6036a16b-dda8-<br>4497-ae22-e3e95a32cb7a.mp4<br>( <b>Obscene</b> )            |                |                 |
| 8-1C        | 3361ac45-8c3a-4976-8e13-<br>ab8209b94523.mp4 ( <b>Obscene</b> )                             |                |                 |
| 8-1D        | Storyboard of 3361ac45-8c3a-<br>4976-8e13-ab8209b94523.mp4<br>( <b>Obscene</b> )            |                |                 |

| EXHIBIT NO. | <u>DESCRIPTION</u>   | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|--|----------------|-----------------|
| 9-1         | Sandisk Cruzer Edge thumb drive (1B1)                            |                |                 |
| 9-1A        | Photo of inscription on Sandisk<br>Cruzer Edge thumb drive (1B1) |                |                 |
| 9-2         | Chain of Custody Form  |                |                 |
| 9-3         | Forensic image of Sandisk Cruzer<br>Edge Thumb Drive (1B1)       |                |                 |
| 9-4         | 10yr_12yr_boys.wmv ( <b>Obscene</b> )                            |                |                 |
| 9-4A        | Storyboard of 10yr_12yr_boys.wmv ( <b>Obscene</b> )              |                |                 |
| 9-5         | File information for 10yr_12yr_boys.wmv                          |                |                 |

| 9-6 | 902(14) certification for Sandisk |  |
|-----|-----------------------------------|--|
|     | Cruzer Edge thumb drive (1B1),    |  |
|     | HP Elite Book 755 laptop (1B2),   |  |
|     | Lexar thumb drive (1B3), and HP   |  |
|     | laptop (S/N: 5CH1262Y5Y) (1B5)    |  |
|     |                                   |  |

| EXHIBIT NO. | <u>DESCRIPTION</u>  | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 10-1        | HP Elite Book 755 laptop (1B2)  |                |                 |
| 10-1A       | Photo of inscription on HP Elite<br>Book 755 laptop (1B2)                                     |                |                 |
| 10-2        | Chain of Custody Form   |                |                 |
| 10-3        | Forensic image of HP Elite Book<br>755 laptop (1B2)   |                |                 |
| 10-4        | mikael and his first bycicle.mpg (Obscene)  |                |                 |
| 10-4A       | Storyboard of mikael and his first bycicle.mpg ( <b>Obscene</b> )                             |                |                 |
| 10-5        | Little_Boy_Bondage_11Y0_And_<br>Men.wmv ( <b>Obscene</b> )                                    |                |                 |
| 10-5A       | Storyboard of Little_Boy_Bondage_11Y0_And_ Men.wmv (Obscene)                                  |                |                 |
| 10-6        | File information for mikael and his first bycicle.mpg and Little_Boy_Bondage_11Y0_And_Men.wmv |                |                 |

| EXHIBIT NO. | DESCRIPTION                                     | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 11-1        | Lexar thumb drive (1B3)                         |                |                 |
| 11-1A       | Photo of inscription on Lexar thumb drive (1B3) |                |                 |

| 11-2  | Chain of Custody Form   |  |
|-------|---|--|
| 11-3  | Forensic image of Lexar thumb drive (1B3)                                       |  |
| 11-4  | young boy forced to suck.wmv (Obscene)  |  |
| 11-4A | Storyboard of young boy forced to suck.wmv (Obscene)                            |  |
| 11-5  | US+Boy+Delights+Daddy.m4v<br>(Obscene)  |  |
| 11-5A | Storyboard of US+Boy+Delights+Daddy.m4v (Obscene)                               |  |
| 11-6  | File information for young boy forced to suck.wmv and US+Boy+Delights+Daddy.m4v |  |

| EXHIBIT NO. | <u>DESCRIPTION</u>  | <u>OFFERED</u> | <u>ADMITTED</u> |
|-------------|---|----------------|-----------------|
| 12-1        | HP laptop (S/N: 5CH1262Y5Y) (1B5)   |                |                 |
| 12-1A       | Photo of inscription on HP laptop (S/N: 5CH1262Y5Y) (1B5)   |                |                 |
| 12-2        | Chain of Custody form for HP laptop   |                |                 |
| 12-3        | Forensic image of HP laptop (S/N: 5CH1262Y5Y) (1B5)   |                |                 |
| 12-4        | [boy+man] young 9yo boy sucks dads cock he cums in his mouth.flv (Obscene)                              |                |                 |
| 12-4A       | Storyboard of [boy+man] young<br>9yo boy sucks dads cock he cums<br>in his mouth.flv ( <b>Obscene</b> ) |                |                 |

| 12-5 | File information for [boy+man]   |  |  |
|------|----------------------------------|--|--|
|      | young 9yo boy sucks dads cock he |  |  |
|      | cums in his mouth.flv            |  |  |
|      |                                  |  |  |

Respectfully submitted,

G. Zachary Terwilliger United States Attorney

By: /s/

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## **CERTIFICATE OF SERVICE**

I hereby certify that on January 8, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/
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